

**IN THE UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY (CAMDEN)**

Caption in Compliance with D.N.J. LBR 9004-2(c)

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In Re:

SHAPES/ARCH HOLDINGS, L.L.C., et al.

Debtors.

Case No. 08-14631-GMB (Jointly
Administered)

Chapter 11

Judge Gloria M. Burns

**RESERVATION OF RIGHTS OF
THE CIT GROUP/BUSINESS
CREDIT, INC., FOR ITSELF AND
AS AGENT, CONCERNING
WITNESSES**

Hearing Date: May 1, 2008, 10:00 a.m.

TO: HONORABLE GLORIA M. BURNS
United States Bankruptcy Judge

The CIT Group/Business Credit, Inc. ("CIT"), for itself and as agent for certain lenders currently consisting of CIT, JPMorgan Chase Bank, N.A. and Textron Financial Corporation (the "Revolving Credit Lenders"), by and through their undersigned counsel, files this reservation of rights with respect to witnesses to be called to testify in connection with (a) the Debtors' request for approval of the adequacy of their proposed joint disclosure statement pursuant to 11 U.S.C. § 1125, and (b) the Debtors' motion for entry of final orders relating to

post-petition financing (collectively, the "Contested Matters"). The hearings on the Contested Matters are currently scheduled for May 1, 2008 at 10:00 a.m.

At this time, CIT does not anticipate calling any separate witnesses with respect to the Contested Matters, although it reserves all of its rights with respect to all witnesses and other matters concerning the Contested Matters. Without limiting the foregoing, CIT reserves the right to call its own or other witnesses as a result of: (i) information discovered in depositions with respect to the Contested Matters; (ii) the testimony of any fact and/or expert witnesses at the hearing on the Contested Matters; and/or (iii) the discovery of additional witnesses with relevant information relating to the Contested Matters.

Respectfully Submitted,

STRADLEY, RONON, STEVENS & YOUNG, LLP

Dated: April 25, 2008

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